

**GREENBERG TRAURIG, LLP**

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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:  
COMPAÑIA DEL BAJO CARONI (CAROMIN), C.A.,  
Calle Cuenca, Manzana 7, Campo B de Ferrominera :  
Quinta Analú, Puerto Ordaz, Estado Bolivar Venezuela, :  
and :

Civil Action No. 07 CV 3179 (NRB)

V.M.C. MINING COMPANY, C.A.,  
Calle Cuenca, Manzana 7, Campo B de Ferrominera :  
Quinta Analú, Puerto Ordaz, Estado Bolivar Venezuela, :

**NOTICE OF MOTION FOR ORDER  
GRANTING LEAVE TO  
WITHDRAW AS COUNSEL**

Plaintiffs,

- against -

BOLIVARIAN REPUBLIC OF VENEZUELA,  
c/o Consulate General of Venezuela  
7 East 51<sup>st</sup> Street  
New York, New York 10022, and

MINISTRY OF BASIC INDUSTRIES AND MINES  
c/o Consulate General of Venezuela  
7 East 51<sup>st</sup> Street  
New York, New York 10022,

Defendants.

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PLEASE TAKE NOTICE, that upon the Declaration James W. Perkins dated January 4, 2008 in support of the motion, Greenberg Traurig, LLP and Colson Hicks Eidson, former counsel to Compañia Del Bajo Caroni (Caromin), C.A, and V.M.C. Mining Company, C.A., will

move this Court, before the Honorable Naomi Rice Buchwald, United States District Judge for the Southern District of New York, at the United States Courthouse located at 40 Centre Street, New York, New York, as soon as counsel may be heard, for an Order, pursuant to Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York and N.Y.S.B.A. Code of Professional Responsibility DR 2-110(B)(4), permitting Greenberg Traurig, LLP and Colson Hicks Eidsonto withdraw as counsel in this action, together with any other and further relief as the Court deems just and proper.

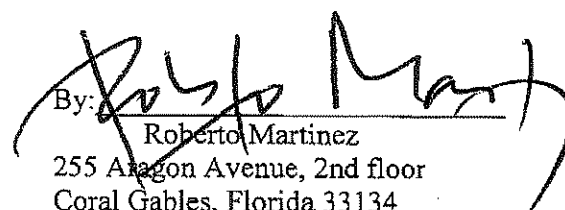
Dated: New York, New York  
January 4, 2008

Respectfully submitted,

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V.M.C. Mining Company, C.A.,  
Calle Cuenca, Manzana 7, Campo B de Ferrominera  
Quinta Analú, Puerto Ordaz, Estado Bolivar Venezuela